

LaWanda A. Johnson, Ph.D.
P.O. Box #561
Aberdeen, WA (98520)
(253) 318 - 0865
Lawanda4656@yahoo.com

FILED ENTERED
LODGED RECEIVED

JUN 24 2025 MH

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

LAWANDA A. JOHNSON, PH.D.,
Plaintiff,
vs.

Case No.: 2:25-cv-01181-DWC

U.S. DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

COMPLAINT FOR INJUNCTIVE RELIEF.
(5 U.S.C. § 552).

and Component

Federal Bureau of Prisons
320 First Street, N.W.
Washington, DC 20534
Defendant.

INTRODUCTION

1. This is an action under the Freedom of Information Act, Improvement Act ("FIA" --P.L. 114-185: June 30, 2016; codified at 5 U.S.C. § 552), for injunctive and other appropriate relief and seeking the disclosure and release of agency records improperly withheld from plaintiff by defendant Department of Justice ("DOJ") and its component Federal Bureau of Prisons ("BOP").

JURISDICTION and VENUE

2. This Court has both subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 5 U.S.C. § 552(a)(4)(B). This court also has jurisdiction over this action pursuant to 28 U.S.C. § 1331. Venue lies in this district under 5 U.S.C. § 552(a)(4)(B).

COMPLAINT FOR INJUNCTIVE RELIEF. (5 U.S.C. § 552). - 1

10. To date, defendant has not provided the records requested by plaintiff in her FOIA request;

where, FOIA requires an agency response within twenty (20) working days. (5 U.S.C. § 552(a)(6)(A)(i)).

11. Also, the “unusual circumstance” claimed by the defendant (Ex. B), appears to be refuted

by (i) Federal designation of the requested records as routine disclosures (Ex. C: p.3); and,

(ii) the historical fact that similar requested records are disclosed within three (3) days. (Ex.

E: p.3). Hence, an extension of ten (10) working days does not appear to be authorized by

5 U.S.C. § 552(a)(6)(B)(i).

12. Notwithstanding, plaintiff offered an alternative time schedule (5 U.S.C. §

552(a)(6)(B)(ii)); but, has received no appointment to personally inspect and copy her

medical records at a local BOP facility as of this filing. (Supporting Declaration: ¶13).

13. Plaintiff has exhausted the applicable administrative remedies with respect to her FOIA

request to defendant DOJ / BOP; because, “unreasonable delays in disclosing non-exempt

documents violate the intent and purpose of the FOIA, and the courts have a duty to prevent

these abuses.” (*Long v. U.S. I.R.S.*, 693 F.2d 907, 910 (9th Cir. 1982)).

14. Defendant DOJ / BOP is wrongfully withholding the requested records from plaintiff.

REQUESTED RELIEF

WHEREFORE, plaintiff prays this Court:

A. Order defendant to disclose the requested records and make copies available to


plaintiff (5 U.S.C. § 552(a)(4)(B));

B. Provide for expeditious proceedings in this action (28 U.S.C. § 1657(a));

C. Award plaintiff her costs incurred in this action (5 U.S.C. § 552(a)(4)(E)); and

D. Grant such other relief as the Court may deem just and proper.

1
2 Dated this 20th day of June, 2025.
3

4 
5 LaWanda A. Johnson, Ph.D. (*In propria*
6 *persona*)
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28